

Application No. 09/683,238

## REMARKS

The FINAL Office Action of May 6, 2005 has been carefully considered. Reconsideration of this application, as amended, is respectfully requested. Claims 1-18 and 21-22 are pending in this application. Of these, claims 1, 11, and 21 are independent claims.

An Amendment faxed March 3, 2005 amended claims 1, 4-7, 9, 11-18, canceled claims 19-20, and added claims 21-22. This Amendment amends claims 1, 11, and 21, cancels claims 7 and 15, and adds claims 23 and 24. In addition, this Amendment amends the specification to correct identified typographical errors. The added claims 23 and 24, set forth similar limitations found in claims 8 and 9, respectively. Claims 1, 11, and 21 were amended to incorporate the limitations of now canceled claims 7 and 15, together amendments to more clearly set forth Applicant's claimed invention. Accordingly, no new matter is believed to be added by these amendments.

### 1. Response to Rejection Under 35 USC 103(a)

The Office Action, beginning on page 2, rejects claims 1-3, 7, 11, and 21-22 under 35 USC 103(a) as being unpatentable over Horowitz et al., U.S. Patent No. 6,122,647 (hereinafter referred to as Horowitz '647) in view of Horowitz et al., U.S. Patent No. 6,236,987 (hereinafter referred to as Horowitz '987). In response thereto, Applicant amends the independent claims 1, 11, and 21 to incorporate the limitations of claims 7 (and 15). Independent claim 1 is discussed below as the representative claim detailing a method for which claims 11 and 21 are directed at a corresponding apparatus and article of manufacture.

Horowitz '647 discloses a method for creating contextual hyperlinks in a source document, where the hyperlinks associate the source document with available target documents. The method includes selecting terms relevant to the user through linguistic analysis, from which relevant target documents are identified. A tagging module receives user selected portions of a document and selects terms to be used for establishing contextual links. A presentation module identifies topics in the knowledge base associated with the selected terms, and creates hyperlinks between the terms in the source document and target documents. (See Horowitz '647 Abstract.)

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Horowitz '987 discloses an information retrieval system and method that dynamically organizes content retrieved in response to user input queries. The system operates on a document collection, in which each document is associated with one or more topics that have arbitrary semantic relationships with each other. In response to a query which may include topic terms, an initial set of documents is selected from the document collection. The documents in the initial set are organized by the topic arrangement, which organization may then be used to narrow or broaden the initial query. Four types of topic arrangements are possible – supertopics (has topics that are associated with all of the documents of the current document set), subtopics (has a selection of topics that provide the best coverage over the current document set), perspective topics (selects topics other than query topics), and theme topics (expresses a subject or a concept describing the document set). (See Horowitz '987 col. 2, line 65 to col. 7, line 34.)

In contrast, Applicant's invention recited in claim 1 concerns a method for enriching document content. The method, which is described in Applicant's specification in paragraphs 0156-0180, includes recording with a reader a digitally readable identifier of a personality identifier, together with context information when the personality identifier is recorded. Further, the claimed method provides that the personality identifier is associated with a personality in a database of personalities. In addition, the claimed method provides that document content identified using the recorded context information is enriched with the associated personality that defines a set of document service requests identifying enrichment themes, for recognizing and annotating entities in the identified document content related to the associated personality and differently depending on the time of year the personality identifier is recorded.

Moreover rejecting now amended claim 1, the Office Action at page 4, last paragraph, to page 5, first paragraph, alleges that the limitations of claim 7 are disclosed by Horowitz '987 in column 8, lines 65-67, column 9, lines 1-5, and column 13, lines 1-3, which are each reproduced below:

The meta-data may include items such as document identifier, title, author, date, publication, industry codes, and the like. Preferably, these items of meta-data may themselves be references to topics in the knowledge base

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130, so that they may be used by the dynamic content organization module 160 to create various topic arrangements. (Horowitz '987 column 8, line 65 through column 9, line 5) ... The number and variety of subsets that is determined to be useful is controlled by a set of parameters to the dynamic content organization module 160. (Horowitz '987 column 13, lines 1-3)

Applicant respectfully submits that the sections of Horowitz '987 recited immediately above (Horowitz '987 column 8, line 65 through column 9, line 5 and column 13, lines 1-3) taken singly or together with Horowitz '647 fail to disclose or suggest time dependent action as claimed by Applicant, and in particular Applicant's recited limitation (originally set forth in claim 7 and now incorporated in independent claim 1) in which entities, which are recognized in identified document content that are related to a personality associated with a personality identifier recorded using a reader, are annotated differently depending on the enrichment theme of the associated personality and what time of year the personality identifier is recorded with the reader.

It is noted that independent claims 11 and 21 contain the very similar limitations to those discussed above with respect to claim 1, and therefore the argument presented above with regard to claim 1 applies equally to independent claims 11 and 21. Accordingly, Applicant respectfully submits that in view of the reasons set forth above independent claims 1, 11 and 21 as amended are patentably distinguishable over Horowitz '647 taken singly or in combination with Horowitz '987.

Insofar as **claims 2, 3, and 22** are concerned, these claims depend from one of now presumably allowable independent claims 1 and 21 and are also believed to be in allowable condition.

In addition, reconsideration and withdrawal of the rejections recited below under 35 U.S.C 103 of claims 4-6, 8-10, and 12-14 and 16-18 because each depends from one of now presumably allowable claims 1 and 11 which is clearly patentable for the reasons set forth above:

A) the Office Action, beginning on page 6, rejects **claims 4-6 and 12-14** under 35 USC 103(a) as being unpatentable over Horowitz '647 in view of Horowitz '987, as applied to claims 1 and 11, and further in view of Wang et al., U.S. Patent

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Publication 2002/0023215 (hereinafter referred to as Wang);

B) the Office Action, starting on page 7, rejects **claims 8-9 and 16-17** under 35 USC 103(a) as being unpatentable over Horowitz '647 in view of Horowitz '987, as applied to claims 1, 14 and 17, and further in view of Goodisman et al., U.S. Patent Application Publication 2002/0069223 (hereinafter referred to as Goodisman);

C) the Office Action, on page 8, rejects **claim 10** under 35 USC 103(a) as being unpatentable over Horowitz '647 in view of Horowitz '987, as applied to claim 1, and further in view of Keith Jr., U.S. Patent Application Publication 2002/0032672;

D) the Office Action, starting on page 9, rejects **claim 18** under 35 USC 103(a) as being unpatentable over Horowitz '647 in view of Horowitz '987, and Wang, as applied to claim 14, and further in view of Goodisman.

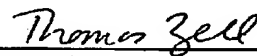
## 2. Fee Authorization And Extension Of Time

No additional fee is believed to be required for this amendment or response, however, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

## 3. Conclusion

In view of the foregoing remarks, reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is hereby requested to call Attorney for Applicant(s), Thomas Zell.

Respectfully submitted,



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Date: July 5, 2005